

DANIEL G. BOGDEN
United States Attorney

JUSTIN E. PINGEL
Assistant United States Attorney
Nevada Bar No. 10186
333 Las Vegas Boulevard South, Suite 5000
Las Vegas, Nevada 89101
Phone: (702)388-6336
Fax: (702)388-6787
Email: *justin.pingel@usdoj.gov*

Attorneys for the United States.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSEPH A. RODRIGUEZ,

Plaintiff,

v.

MILAGROS CLAVANO, JANICE CULLEN,
MARCY LUKES BLAKE, THE UNITED
STATES POSTAL SERVICE,

Defendants.

Case 2:09-cv-00395-JCM-PAL

UNOPPOSED MOTION FOR EXTENSION OF TIME
(First Request)

Federal Defendants Milagros Calvano, Janice Cullen, Marcy Lukes Blake, and The United States Postal Service (hereinafter, collectively as the “United States”), by and through Daniel G. Bogden, United States Attorney, and Justin E. Pingel, Assistant United States Attorney for the District of Nevada, respectfully request an extension of time for the United States to file an Answer or otherwise respond in the above-entitled case until on or before February 24, 2012. The United States’ Answer or other response is currently due on or before February 3, 2012.

1 In support of the instant Motion, the United States submits the following:

2 1. This Motion is brought in order to accommodate the undersigned counsel for the
3 United States.

4 2. On December 5, 2011, Plaintiff served the instant Amended Complaint and seeks
5 relief pursuant to Title VII of the Civil Rights Act of 1964 and other provisions. *See* Complaint.

6 3. The requested extension of time is necessary in order for United States' counsel
7 to fully consult with the agency counsel assigned to this case. Due to agency counsel's schedule
8 and a shifting of responsibilities within the agency, as well as the history of this case, a
9 sufficient review of this case has been difficult.

10 4. On January 31, 2012, undersigned counsel for the United States contacted
11 Plaintiff to request an extension of time to Answer or otherwise respond to Plaintiff's
12 Complaint until on or before February 24, 2012. Plaintiff did not oppose the requested
13 extension.

14 5. The instant motion is filed in good faith and not for the purposes of delay.


15 WHEREFORE, for the above reasons, the United States respectfully requests the instant
16 Motion extending time to file an Answer or otherwise respond in the above-entitled case until
17 on or before February 24, 2012, be granted.

18 Respectfully submitted this 31st day of January 2012.

19 DANIEL G. BOGDEN
20 United States Attorney

21 /s/Justin Pingel
JUSTIN E. PINGEL
22 Assistant United States Attorney

23
24 IT IS SO ORDERED:

25 
UNITED STATES OF AMERICA JUDGE
26 DATED: Hgdtwct{'3.'4234

PROOF OF SERVICE

I, Justin E. Pingel, AUSA, certify that the following individual was served with the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on this date by the below identified method of service:

U.S. Mail

Joseph Rodriguez
23-39 99th Street 3rd Floor
East Elmhurst, New York 11369

DATED this 31st day of January 2012.

/s/ Justin E. Pingel
JUSTIN E. PINGEL
Assistant United States Attorney